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Via ECF and Hand Delivery

January 2, 2019

The Honorable George B. Daniels
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001
03 MDL 1570 (GBD) (SN)

Dear Judge Daniels and Judge Netburn:

We represent the Plaintiffs who commenced actions on December 26, 27, 28 and 31, 2018 by adopting the Saudi Arabia Short Form Complaint and asserting the factual and jurisdictional allegations from the Consolidated Amended Saudi Arabia Complaint, as well as by adopting the Iran Short Form Complaint and asserting the factual and jurisdictional allegations from the *Burnett* Iran Complaint. We also represent plaintiffs who have previously sued the Kingdom of Saudi Arabia, including the *O'Neill* putative class action¹ and by way of individual cases filed in December 2018,² along with plaintiffs who have previously sued the Republic of

¹ *Estate of John Patrick O'Neill, Sr., et al. v Kingdom of Saudi Arabia, et al.* 04-CV-01922 (GBD) (SN).

² *Abel, et al. v. Kingdom of Saudi Arabia*, 18-CV-11880; *Bonomo, et al. v. Kingdom of Saudi Arabia*, 18-CV-11885; *Cintrón-Lugos, et al. v. Kingdom of Saudi Arabia*, 18-CV-11888; *DeConto, et al. v. Kingdom of Saudi Arabia*, 18-CV-11904; *Lang, et al. v. Kingdom of Saudi Arabia*, 18-CV-11926; *Gordenstein, et al. v. Kingdom of Saudi Arabia*, 18-CV-11941; *Harris, et al. v. Kingdom of Saudi Arabia*, 18-CV-11946; *Garger, et al. v. Kingdom of Saudi Arabia*, 18-CV-11950; *Bush, et al. v. Kingdom of Saudi Arabia*, 18-CV-11964; *Mercer, et al. v. Kingdom of Saudi Arabia*, 18-CV-11965; *Murray, et al. v. Kingdom of Saudi Arabia*, 18-CV-11966; *Perez, et al. v. Kingdom of Saudi Arabia*, 18-CV-11967; *Richards, et al. v. Kingdom of Saudi Arabia*, 18-CV-11969; *Rooney, et al. v. Kingdom of Saudi Arabia*, 18-CV-11970; and *Spence, et al. v. Kingdom of Saudi Arabia*, 18-CV-11971. On December 21, 2018, we sent a letter requesting that the above-referenced cases be made part of 03 MDL 1570 (GBD) SN).

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Iran, including the original *O'Neill* individual suit,³ and individual cases filed in June, July, and early December 2018.⁴

In addition, we represent the Plaintiffs who commenced class actions on December 21, 2018, which we believe are related to the previously filed *O'Neill* class actions.⁵ These actions solely added additional causes of actions prior to the potential expiration of statutes of limitations and our intents are to move to combine them with the pending cases.

Pursuant to Judge Netburn's Order dated July 10, 2018, docketed under the MDL as Docket Number 4045 ("July 10, 2018 Order"), we respectfully request that the following cases be made part of this MDL:⁶

1. *O'Neill, et al. v. The Muslim World League, et al.*;
Case Number: 1:18-cv- 12041 (Exhibit 1)
2. *O'Neill, et al. v. Republic of the Sudan, et al.*;
Case Number: 1:18-cv-12114 (Exhibit 2)
3. *Aamoth, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-12270 (Exhibit 3)
4. *Deuel, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv- 12272 (Exhibit 4)

³ *Estate of John Patrick O'Neill, Sr., et al., v. The Republic of Iraq, et al.*, 04-civ-1076 (GBD) (SN)

⁴ *DeRubbio, et al. v. Islamic Republic of Iran*, 18-CV-05306 (GBD) (SN); *Agyeman, et al. v. Islamic Republic of Iran*, 18-CV-05320 (GBD) (SN); *Morris, et al. v. Islamic Republic of Iran*, 18-CV-05321 (GBD) (SN); *Schlissel, et al. v. Islamic Republic of Iran*, 18-CV-05331 (GBD) (SN); *Kamardinova, et al. v. Islamic Republic of Iran*, 18-CV-05339 (GBD) (SN); *Ades, et al. v. Islamic Republic of Iran*, 18-CV-07306 (GBD) (SN); *Abel, et al. v. Islamic Republic of Iran*, 18-CV-11837; *Kim, et al. v. Islamic Republic of Iran*, 18-CV-11870; *Jimenez, et al. v. Islamic Republic of Iran*, 18-CV-11875; *Moody-Theinert, et al. v. Islamic Republic of Iran*, 18-CV-11876; *Rivelli, et al. v. Islamic Republic of Iran*, 18-CV-11878. On December 21, 2018, we sent a letter requesting that the cases filed in early December 2018 be made part of 03 MDL 1570 (GBD) SN).

⁵ *Estate of John Patrick O'Neill, Sr., et al. v Kingdom of Saudi Arabia, et al.*, 04-CV-01922 (GBD) (SN) (filed March 10, 2004); *O'Neill, et al. v. Republic of the Sudan, et al.*, 18-CV-12114 (filed December 21, 2018); *Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment and Development Corporation, et al.*, 04-CV-01923 (GBD) (SN) (filed March 10, 2004); *O'Neill, et al. v. The Muslim World League, et al.*, 18-CV-12041 (filed December 21, 2018).

⁶ Copies of the pleadings and Statements of Relatedness as to the newly filed actions are attached to this letter as exhibits.

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5. *Kincaid, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv- 12273 (Exhibit 5)
6. *Ortiz, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-12274 (Exhibit 6)
7. *Stackpole, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-12275 (Exhibit 7)
8. *Zelmanowitz, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-12381 (Exhibit 8)
9. *Aamoth, et al. v. Islamic Republic of Iran*;
Case Number: 1:18-cv-12276 (Exhibit 9)
10. *Marinella, et al. v. Islamic Republic of Iran*; and,
Case Number: 1:18-cv-12277 (Exhibit 10)
11. *Rohenhorst, et al. v. Islamic Republic of Iran*;
Case Number: 1:18-cv-12387 (Exhibit 11)

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Jerry S. Goldman

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*Attorney for the Plaintiffs in the above-listed
cases (along with the plaintiffs in 04-civ-
1922, the "O'Neill Plaintiffs")*

cc: All MDL Counsel of Record (via ECF, without enclosures)
Encl.